

THE LOREE LAW FIRM

PHILIP J. LOREE JR

February 9, 2023

VIA ECF and EMAIL

Hon. Katherine Polk Failla
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square, Room 2103
New York, NY 10007
Failla_NYSDChambers@nysd.uscourts.gov

Re: Geo-Group Communications, Inc. (“GCI”) v. Shah, et. al., No. 15 Civ. 1756 (KPF) | GCI’s and the Shahs’ Joint Letter to Court Concerning Status of Meet and Confer

Dear Judge Failla:

This letter is submitted jointly by Shomik Ghosh, counsel for Nayana B. Shah and Defendant Vipin B. Shah (the “Shahs”), and Philip J. Loree Jr., counsel of record for Plaintiff GCI.

On January 27, 2023, the parties had a telephonic meet and confer pursuant to the Court’s January 11, 2023, Order. Because the meet and confer was, in general, productive, and the parties were able to identify some common ground on how issues might be resolved, the parties jointly requested, and the Court granted, a one-week extension, from February 3, 2023 to February 10, 2023, of the deadline for filing their 3-page joint-letter recapping the meet and confer and addressing any unresolved disputes concerning it. Since February 10, 2023, the parties have corresponded extensively in an effort to resolve the disputes between them without Court intervention and made significant progress.

As of this afternoon, February 9, 2023, the parties reached agreement in principle on several issues, and proposals had been made with respect to a few issues on which the parties are close to reaching agreement but are not quite there yet.

Because the parties remain committed to resolving as many of the issues as reasonably possible without the Court’s intervention, they jointly propose and respectfully request that the Court grant a two-business-day further extension of the time within which to file their joint letter, which would adjourn the deadline from February 10, 2023, until February 14, 2023.

February 9, 2023

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The parties greatly thank the Court for its attention to this matter.

Respectfully submitted,



Philip J. Loree Jr.

Counsel for Plaintiff Geo-Group
Communications, Inc.

/s/ Shomik Ghosh (by Philip J. Loree Jr.
with authorization)

Shomik Ghosh

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Pro Se Dismissed Defendant Mahendra
Shah (by email)
All other parties and counsel of record
(via ECF)